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August 23, 2024

Via ECF

Honorable Brian R. Martinotti, U.S.D.J.
United States District Court
District of New Jersey
U.S. Post Office & Courthouse
2 Federal Square
Newark, NJ 07102

Re: *In re Insulin Pricing Litigation*, No. 23-md-3080 (MDL 3080)
Unopposed Request for Extension of Time to File Motion to Seal

Dear Judge Martinotti,

Yesterday, the parties filed briefs and other papers in support of and in opposition to Defendants' Motions to Dismiss the Self-Funded Payor Track Complaints (Albany, King, and Lake Counties) (ECF Nos. 250-259). The parties filed those materials temporarily under seal pending decision on a forthcoming motion to seal, which we will submit in accordance with Local Rule 5.3. By operation of the rule, the motion to seal is due by September 5, 2024.

In accordance with L.Civ.R. 6.1, the PBM Defendants respectfully request a fourteen-day extension—until **September 19, 2024**—to file the motion to seal. We submit that the requested extension will afford the parties adequate time to confer about the scope of any sealing requests and for the PBM Defendants to secure any requisite certifications. Plaintiffs do not oppose this request. If the proposed extension meets with Your Honor’s approval, we respectfully request that the Court indicate its agreement by so ordering this letter.

Thank you for your continuing time and attention to this matter.

Respectfully submitted,

John D. Tortorella

cc: Honorable Rukhsanah L. Singh, U.S.M.J. (via ECF)
All Counsel of Record (via ECF)

So Ordered:

Brian R. Martinotti, U.S.D.J.